

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	CASE NO. 1:19CR003
	:	
Plaintiff,	:	
	:	JUDGE DAN A. POLSTER
vs.	:	
	:	
THOMAS J. CLOSE,	:	<b><u>DEFENDANT'S UNOPPOSED</u></b>
	:	<b><u>MOTION TO CONTINUE</u></b>
Defendant.	:	

Defendant, through counsel, respectfully moves this Honorable Court for a continuance of the trial, and all other dates/deadlines in the pretrial order. At today's hearing, the parties discussed the need for a continue based on the interest of justice. Due to the voluminous amount of forensic at issue in this case, both the defense and the government need additional time. There is a 5 Terrabyte hard drive at issue plus several other devices that need forensic evaluation. At today's hearing, a date was suggested for May 20, 2019 at 11:30 a.m. to hold another status conference to determine where the case stands. That date works for all parties. Therefore, a continuance is requested. The ends of justice served by granting this motion outweigh the best interests of the public and Mr. Close in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

Defense counsel has discussed this matter with Assistant U.S. Attorney Carol Skutnik. She stated that the government has no objection to this motion.

For these reasons Mr. Close requests that the Court grant this motion.

Respectfully submitted,

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Federal Public Defender  
Ohio Bar: 0051928

/s/ Jeffrey B. Lazarus  
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**CERTIFICATE OF SERVICE**

I hereby certify that on March 11, 2019, a copy of the foregoing Motion was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's system.

/s/ Jeffrey B. Lazarus  
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